

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RAUL M. ESPITIA, : Case No. C-1-00-531
: Plaintiff, : Judge Herman J. Weber
: v. :
THE PROCTER & GAMBLE COMPANY, : **MEMORANDUM IN SUPPORT OF**
et al., : **DEFENDANT THE PROCTER &**
Defendants. : **GAMBLE COMPANY'S BILL OF COSTS**

The following is an itemization of costs listed on Defendant The Procter & Gamble Company's Bill of Costs. Supporting Documentation is attached hereto as Exhibit A.

A. Court Reporter Fees For Deposition Transcripts Necessarily Obtained For Defendant's Motion For Summary Judgment

1.	Deposition of Plaintiff Raul Espitia:	\$1544.53
2.	Deposition of Patrick Tewksbury	\$369.00
3.	Deposition of Mary O'Rourke	\$116.10
4.	Deposition of Ray Maynard	\$140.40
5.	Deposition of Tonya King	\$228.00
6.	Deposition of Barbara Lancor	\$219.00
7.	Deposition of Michael Lindsey	\$279.00
8.	Deposition of Kim Zimmer	\$330.00
9.	Deposition of Dwain Carver	\$159.30
10.	Deposition of Tom Winters	\$114.00
11.	Deposition of Tom Brown	\$167.40

12.	Deposition of Jeff Drago	\$327.00
13.	Deposition of Joe Beer	\$138.00
14.	Deposition of Steve Lighthall	\$183.60
15.	Deposition of Curtis Salyers	\$186.30
16.	Deposition of J. Scarella	\$ 99.90
17.	Deposition of N. Bess	\$ 105.00
	SUBTOTAL	\$4706.53

B. Duplication Costs (Fees For Printing)

1.	Answer:	
	7 pages X \$0.10/page X 4 copies ¹	\$2.80
2.	Discovery Produced To Plaintiff:	
	1,747 pages X \$0.10/page X 1 copy	\$174.70
3.	Motion For Summary Judgment and Memorandum In Support	
	25 pages X \$0.10/page X 4 copies	\$10.00
4.	Appendix To Motion For Summary Judgment	
	167 pages X \$0.10/page X 4 copies	\$66.80
5.	Reply Memorandum In Support Of Motion For Summary Judgment (with attached Exhibits)	
	64 pages X \$0.10/page X 4 pages	\$25.60
	SUBTOTAL	\$279.90

¹ Includes one Court copy, one opposing counsel copy, one client copy, and one attorney work copy.

Respectfully submitted,



Michael S. Glassman (0012713)
DINSMORE & SHOHL LLP
1900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
(513) 977-8200

Attorney for Defendant
The Procter & Gamble Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via electronic mail this 15th day of March, 2004 upon Sheila M. Smith and Kelly Mulloy Meyers, Esq., Freking & Betz, 215 East Ninth Street, Fifth Floor, Cincinnati, Ohio 45202 and James B. Robinson, Esq. Kircher Robinson & Welch, 2520 Kroger Building, 1014 Vine Street, Cincinnati, OH 45202-1116.



#809178

LITIGATION SUPPORT SERVICES.
 602 Main Street, Suite 703
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 (513) 381-8228 • FAX (513) 381-8254
 (800) 578-1542



Job #: 010425LL

Job Date: 04/25/2001

Order Date: 04/25/2001

DB Ref.#:

Date of Loss: / /

Your File #:

Your Client: P&G

Invoice #: 17508

Inv.Date: 05/08/2001

Balance: \$1,342.93

Bill To:
Mr. Michael S. Glassman, ESQ
Dinsmore & Shohl LLP
1900 Chemed Center
255 East Fifth Street
Cincinnati, OH 45202-3172

Action: Espitia

VS

P & G

Action #:**Rep: Luke Lavin****Cert:**

Item	Proceeding/Witness	Description	Disc. Amt.	Amount
1	Raul M. Espitia	Attendance of Reporter	\$28.00	\$252.00
2	Raul M. Espitia	Attendance Overtime of Reporter	\$7.50	\$67.50
3	Raul M. Espitia	Original Transcript	\$113.72	\$1,023.43
4	Raul M. Espitia	Condensed Transcript	\$0.00	\$0.00

Comments:

YOUR DISCOUNT LEVEL IS NOW AT 10%, YOU HAVE SAVED \$149.22

Balances over 15 days may be subject to Finance Chg. @ 1.5%

Federal Tax I.D.: 31-1469133

Terms: Net 15 Days.

Sub Total	\$1,342.93
Shipping	\$0.00
Tax	N/A
Total Invoice	\$1,342.93
Payment	\$0.00
Balance Due	\$1,342.93

Please KEEP THIS PART for YOUR RECORDS.

Please SIGN this card before returning it to our PAYMENT

*Annette McKeon Schoch*Annette McKeon Schoch
Dinsmore & Shohl, LLP

BILL TO

Michael S. Glassman, Esq.
 Dinsmore & Shohl, LLP
 1900 ChemEd Center
 255 East Fifth Street
 Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2563

8/27/01	6360
8/27/01	2563
8/27/01	827-01
8/27/01	1310
8/27/01	72102
8/27/01	8-13-01

*Michael S. Glassman, Esq.**8/27/01 2/3*

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	8-9-01

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - M. O'Rourke case volume discount	1	129.00 -10.00%	129.00 -12.90
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depo of: M. O'ROURKE Taken: 8-9-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$116.10

Annelle McKeehan Schoch

*Registered Information Reporter
Registered Court Reporter*

BILL TO		
Michael S. Glassman, Esq. Dinsmore & Shohl, LLP 1900 ChemEd Center 255 East Fifth Street Cincinnati, Ohio 45202-3315		

Invoice

DATE	INVOICE #
6/21/01	2516

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	4-30-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript #1	1	228.00	228.00
Copy of Transcript #2	1	369.00	369.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII		0.00	0.00
Postage/Courier 6-14-01		7.335	7.34
<p style="text-align: right;"> <i>6360 2516 6-21-01 1310 69132 7-5-01</i> </p>			
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al. C-1-00-531			
Depos of: TONYA KING PATRICK TEWKSBURY			
Taken: 4-30-01			
Reporter: AS			
Federal ID #: 31-1503265		Total	\$604.34

7/15/01 2:13

*M. W. Glassman
6/21/01*

Annelie McKeegan Schoch

*Regional Professional Referrals
Annelie McKeegan Schoch*

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Invoice

DATE	INVOICE #
8/27/01	2551

6300
2551
8-27-01
1310

72102
9-13-01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-13-01

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - M. Lindsey	1	279.00	279.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII		0.00	0.00
Postage/Courier 8-6-01		5.00	5.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depo of: M. LINDSEY Taken: 7-13-01 Reporter: AMS			
Federal ID #: 31-1503265			
		Total	\$284.00

Atticile McKeown School

Atticile McKeown School
Professional Reporter
McIntire Merit Reporter

BILL TO
Michael S. Glassman, Esq. Dinsmore & Shohl, LLP 1900 ChemEd Center 255 East Fifth Street Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2560

4360
2560
8-27-01
1310

72102
9-13-01

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-26-01 A-C

DESCRIPTION	QTY	RATE	AMOUNT
Original Transcript - R. Espitia #2 case volume discount	1	224.00 -10.00%	224.00 -22.40
Copy of Transcript - R. Maynard case volume discount	1	156.00 -10.00%	156.00 -15.60
Copy of Transcript - T. Brown case volume discount	1	186.00 -10.00%	186.00 -18.60
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
 RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depos of: R. ESPITIA (Vol.#2) R. MAYNARD T. BROWN Taken: 7-26-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$509.40

Amelia McKeelum Schoch

BILL TO
Michael S. Glassman, Esq.
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1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2554

W. H. Hamilton

July 3, 1933

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-20-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - D. Carver case volume discount	1	177.00 -10.00%	177.00 -17.70
Copy of Transcript - C. Salyers case volume discount	1	207.00 -10.00%	207.00 -20.70
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al C-1-00-531 Depos of: D. CARVER C. SALYERS Taken: 7-20-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$345.60

Amelle McEwan Schuch

Kryptologisch professionell Reporter

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2557

Philip Morris Co.

July 3 - 215

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-25-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - S. Lighthall	1	204.00	204.00
case volume discount		-10.00%	-20.40
Copy of Transcript - J. Scarcella	1	111.00	111.00
case volume discount		-10.00%	-11.10
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-6-01		0.00	0.00
RAUL ESPITIA -vs-			
PROCTER & GAMBLE, et al			
C-1-00-531			
Depos of: S. LIGHTHALL			
J. SCARCELLA			
Taken: 7-25-01			
Reporter: AS			
Federal ID #: 31-1503265		Total	\$283.50

Annette McKeown Schoch

Angewandte Praktische Rechner

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2548

6360
2548
8-27-01
1310

73102
9-13-01

H. H. Hassler

1963-215

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-10-01 A&B

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - J. Drago	1	327.00	327.00
Copy of Transcript - N. Bess	1	105.00	105.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-3-01		0.00	0.00
RAUL ESPITIA -vs-			
PROCTER & GAMBLE, et al			
C-1-00-531			
Depos of: J. DRAGO			
N. BESS			
Taken: 7-10-01			
Reporter: AS			
Federal ID #: 31-1503265			
		Total	\$432.00

Total

\$432.00

Annette McKeehan Schoch

Registration of Comprehensive Reporter Registers and Major Registers

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2545

6340
2345
8-27-01
1310

72102
9-13-0

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-5-01

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript	1	138.00	138.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII ON EACH		0.00	0.00
Postage/Courier 8-3-01		0.00	0.00
RAUL ESPITIA -vs-			
PROCTER & GAMBLE, et al			
C-1-00-531			
Depo of: J. BEER			
Taken: 7-5-01			
Reporter: AS			
Federal ID #: 31-1503265		Total	\$138.00

Total

\$138.00

Annette McKeehan Schoch

Applications of the Social Reporter

BILL TO

Michael S. Glassman, Esq.
Dinsmore & Shohl, LLP
1900 ChemEd Center
255 East Fifth Street
Cincinnati, Ohio 45202-3315

Invoice

DATE	INVOICE #
8/27/01	2542

Please play again

FILE NUMBER	TERMS	DEPONENT
P&G/Espitia	Net 30	7-3-01 A-C

DESCRIPTION	QTY	RATE	AMOUNT
Copy of Transcript - Zimmer	1	330.00	330.00
Copy of Transcript - Lancor	1	219.00	219.00
Copy of Transcript - Winters	1	114.00	114.00
Litigation Support Package (Below)		0.00	0.00
Condensed Text, Word Index, ASCII on each		0.00	0.00
Postage/Courier 8-3-01		5.00	5.00
RAUL ESPITIA -vs- PROCTER & GAMBLE, et al. C-1-00-531 Depos of: K. ZIMMER B. LANCOR T. WINTERS Taken: 7-3-01 Reporter: AS			
Federal ID #: 31-1503265		Total	\$668.00